

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

PEOPLE OF THE STATE OF MICHIGAN

Plaintiffs

Case No. 1:24-cr-00115-HYJ

V

Hon. HALA Y. JABOU

Chief District Court Judge

BRIAN WILLIAM KEELY,

Defendant

ORONDE C. PATTERSON (P 57211)

ERIKA A. TUSAR (P 56831)

JOHN S. PALLAS (P 42512)

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**PEOPLE'S EMERGENCY RESPONSE TO DEFENSE MOTION TO
INSPECT VEHICLE MOTION**

NOW COMES the **MICHIGAN DEPARTMENT OF ATTORNEY GENERAL**, by and through, Attorney General DANA M. NESSEL, and Assistant Attorney's General Oronde Patterson (P57211) and Erika Tusar (P56831), and respond to the defense motion to inspect the vehicle Officer Keely was driving during the incident and states as follows:

1. The People wish to be heard on this Motion before the Court rules.
2. The parties have been trying to negotiate with defense counsel for weeks and have offered several solutions to no avail including asking defense counsel to file something with the Court before today's date.

WHEREFORE People respectfully ask that the People be heard before ruling on this Motion and adjourn the defense request.

Respectfully submitted,

A handwritten signature in blue ink, reading "Oronde Patterson", is positioned above a horizontal line.

Oronde Patterson (P57211)
First Assistant Attorney General
Criminal Trial Division